NARRATIVE RESPONSES FOR TRIBAL GAMING ESTABLISHMENTS

- 2d. Thinking back over the last five years, have the requirements for background checks changed? Have they become more extensive, less extensive or stayed about the same? Are there other changes over the years? Please describe.
- O1 Stayed the same
- O2 Facility regulations more stringent
- 03 Don't know
- Of Stayed the same
- 07 Became more extensive, regulators stricter and more detailed
- 11 Become more extensive
- 14 Federal and Tribal have stayed the same, but State requirements have become more stringent
- 15 Become more extensive
- 15 Minor changes, but Tribal laws are already strict
- 16 Stayed the same
- 17 Simpler
- 20 Become more extensive
- 20 Seen an increase in investigations of applicant's financial dealings
- Have to check more locations/cities due to increased mobility in today's society. Are seeing that applicants have held many more positions in the past, therefore requiring more checks.
- 25 Discretion limited to ten years
- 26 Stayed the same
- Now a need to ascertain consumer credit history
- 28 Stayed the same
- 29 Stayed the same
- 32 Stayed the same
- 40 Simpler
- 47 Become more extensive
- 48 Become more extensive
- 49 Become more extensive through new tribal regs
- 51 Become more extensive
- Became more extensive, consistently strict
- 55 Stayed the same
- 57 Become less extensive
- Become more extensive, just started DMV checks 2 years ago
- As we do more, we get better and more thorough
- 64 Stayed the same
- 77 Became more extensive
- 78 Became more extensive
- 79 Stayed about same
- 79 Stayed about the same
- 79 Stayed the same

- 80 Done in-house
- 82 Stayed the same
- Stayed the same
- Stayed the same
- 87 Become more extensive
- 93 Become more extensive
- 94 Stayed the same95 Stayed the same
- Stayed the sameBecame more extensive, stricter self-imposed rules
- 100 Staved the same
- Has not noticed a change
- Become more extensive, more thorough now than when just had Bingo, have only had other games for about two years
- Become more extensive, when first started only backgrounded key and management employees. Now they background everyone.
- 104 Stayed about the same
- 106 Always busy
- More forms
- 107 More financial investigations
- More fluid society, people moving a lot, change jobs more, so checking more locations
- 108 Become More extensive
- 108 Improvements in technology and availability of information
- Risen in quality
- 109 Stayed the same
- Become more extensive because handling more cash, so more regulations
- 111 Become more extensive
- Less accepting of improprieties in peoples' pasts.
- 117 Stayed the same
- 118 Stayed the same
- Only in last few months
- 122 Become more extensive
- 123 Stayed the same
- 124 Became more extensive
- 125 Became more extensive
- Become more extensive, some changes in federal law, but didn't really affect tribe because they were already stringent regulations.
- Become more extensive, system better: more employees and more efficient.
- Become more extensive, system better: more employees and more efficient.
- 129 Stayed the same
- 129 Stayed the same
- Become more extensive, became a requirement within the last 3-4 years
- 133 Stayed the same
- 134 Stayed the same
- Became more extensive, NIGC more often
- Become more extensive since passage of Prop. 5.

01 02 Tribal governments requirements increased—all employees Don't know 03 06 No 07 No 09 No, getting less rejections, but basically the same 10 Yes, up in cost only 11 No 13 Yes 14 State requirements have changed because of implementation of State compact within last five years 15 No 16 No No, but wish for electronic. 17 20 No 25 No 26 No 27 No Processing is faster, 6 week turnaround 28 29 No 32 No 33 Same 36 Yes, implemented 100% 40 No 47 No 48 No 49 51 More extensive, all employees checked 54 No 56 No 57 Yes, now have arrest notification 58 No 59 Yes, implemented 100% 62 No 64 No 77 No, but in house drug enforcer now 78 Don't know 78 No 79 No 81 No 82 Stayed the same 84 No

85

No

3d. In the past five years have fingerprinting requirements changed? If so, how?

87 Don't know 93 No 94 Guidelines of the FBI have changed 94 Technology has advanced 95 No 99 No 100 No 103 No 104 No 105 No 106 No 107 Response time slow 108 No 109 No 110 No 111 No 117 More frequent Tribal government requirements increased 118 Only in last few months 121 122 No 123 No 124 Don't know 125 Yes, two sets of fingerprints required by state 127 No 129 No 130 No 132 133 Fingerprints come back faster Forms from FBI 133 134 No Don't know 136 138 No 4g. Has anything about these checks (on gaming equipment) changed over the last five years? 01 No 02 No 03 No, just different manufacturers 06 No response Very consistent 07 09 No, its always been this stringent

10

11

13

14

Don't Know

Not applicable

No

No

- 15 Become more detailed
- More frequent due to new machines
- More technology
- 17 Improved, added more to the list
- 20 No
- Yes, new internal computer systems
- 26 No
- 27 No
- No response
- No response
- 32 No
- 33 Same
- 36 Less comfort with tribal self-regulation
- Yes, have improved and added more to the check list
- 47 No response
- 48 More standardized, formal accounting practices
- 49 More extensive, better chance of malfunction because of more players
- More frequent by tribe and NIGC
- 54 Same
- Pretty much the same, but the tribe has intensified its own efforts.
- More stringent
- More frequent, more technical
- 58 No
- 59 Less comfort with tribal self-regulation
- 62 Tougher
- Notice additional checks each year.
- 77 No.
- 78 No
- 79 More stringent
- 81 No
- Yes in that now they have a compact and didn't 5 years ago.
- 84 Equipment is new and better, more modern
- Because of increased knowledge; we know what to look for
- Increased internal controls led to state's confidence of internal controls, decreased their oversight. For example, the first audit was seven officers for one week; the most recent audit was three officers for two days.
- 87 No
- 93 No
- 94 No
- 95 Don't know
- 99 Compliance officers check instead of slot technicians
- 100 No
- Same
- Yes, stricter to make sure internal controls being adhered to.
- 105 Copitron has come in
- 106 Increased presence

- 106 Upgrade in software
- Equipment newer and better, because more modern
- 108 Become more detailed
- 109 No
- 110 No
- 111 Changed with equipment.
- 117 Same checks
- The frequency is the same, but technology has improved the testing
- 121 No
- 122 No
- No response
- Become easier because of technology, but more escalated use
- 125 Testing more frequently to prevent malfunctions and compact violations
- 127 Costs have increased (costs go up with everything else)
- 129 Same
- 130 No.
- 132 No
- 133 Improved
- No response
- 136 Same
- 138 No

5c. What kind of training is required? (Are you required to provide any special training to your employees?)

- 01 Machine testing
- Train police and investigators
- 03 Title 31
- 06 Dealers
- 06 Security
- 06 Surveillance
- 07 Equipment training for some positions
- 07 Investigatory, identify cheaters
- 09 CASINO: have to receive training to achieve certain level of internal control
- 09 REGULATORS: send to Atlantic Coast College in Atlantic City (\$1100 per person/ 30 persons)
- O9 State is developing gaming academy
- 09 Training academy and Gaming Laboratories International
- 10 Not applicable
- 11 Dealers
- 11 Floor personnel
- 11 Gaming devices
- 11 Machines
- Not applicable
- 14 Compliance training for Federal Money Reporting Act
- 14 Game/department specific training

- Before begin work, go through HR training
- 15 Dealers
- 15 Department specific training
- Each type of employee receives different training
- Slot technicians train at local community college or at places recommended by gaming technicians
- 15 Some employees are certified by state
- Various, depends on department. HR, customer service, etc. Title 31 on a regular basis (every six months)
- 16 Department/game specific training
- 16 Problem gambling and addiction training
- 16 Surveillance and security
- 17 Not applicable
- 20 General management and orientation training
- 20 Safety training
- 20 Game specific training
- 25 Off site training for enforcement and investigation
- 25 Training of state troopers
- 26 Certificate of completion
- 26 Establish training department
- 26 Gaming school curriculum
- No response
- 28 Dependent on department
- 28 Extensive in finance issues
- 28 Title 31
- 29 Dealers
- 29 Security
- 29 Surveillance
- 32 Not applicable
- 33 Not applicable
- 36 Not applicable
- 40 Not applicable
- 47 New hire orientation for certification
- 48 Attending machines
- 48 Floor workers
- 48 Gaming dealers
- 48 Gaming equipment
- 49 Management company requires training
- Not required, but is tribal policy
- None but it is tribal policy
- Lasts about 3 weeks.
- Orientation, IGRA training, Compact training, machine layout, operations and communications training
- Not applicable
- Not applicable
- Not applicable

- Not applicable
- Various, depends on department
- HR, customer service, Title 31
- 64 Department specific
- Depends on department, dealer has dealer training
- 77 Orientation
- 77 Training for title 31
- 78 GLI outside training for slots
- 79 New machines course for technicians on how to repair, etc.
- 79 Not applicable
- Dealer schools, craps training, game dept. specific
- Not applicable
- Not applicable
- 85 OSHA, etc.
- Not applicable
- 93 Background Investigations
- 93 Fingerprinting
- 93 Leasing and compact agreements
- 93 Licensing and processing
- 93 Machine Testing
- 93 Monitoring games
- 93 Security
- 95 Management
- 95 Orientation for Indian regulation
- 95 TIPS alcohol awareness training
- 95 Title 31
- 95 To learn compact
- 99 Varies by position
- 100 Alcohol counseling service
- Depends on department
- 100 Title 31
- Take public relations class and health classes
- Not applicable
- Not applicable
- 106 Floor training
- 106 Minimum 30 hours for dealers
- 106 Pit training
- 107 Game specific: dealers have own training school
- Safety, managerial, communications training, orientation, firearms qualifications for security, CPR training and other firs aid
- Regulation compliance training to all, company policies, etc.
- Depends on department
- Depends on department
- All levels. Cage personnel, bills and audits.
- 111 Job specific
- 111 MICS requirements

- 111 Title 31
- 117 Not applicable
- 118 Department specific (depends on games)
- No response
- 121 No response
- 122 Equipment
- 122 Gaming equipment
- 122 Machines
- 123 Dealers
- 123 Security
- 123 Surveillance
- 124 Responsible gaming meetings
- 124 Safety training
- 124 Title 31
- Not required but is tribal policy
- 127 Regulators also train them
- 127 Training covers all aspects of gaming. Each department has different requirements
- 129 Not applicable
- Not applicable
- 132 Security department
- 133 Constant training, large turnover
- 133 Internal controls, report writing, cashiers, slots
- Not applicable
- 136 Depends on department
- Not applicable

5d. Have the training requirements changed over the last five years?

- 01 More federal regulators
- 01 More frequent testing
- Yes 40 hours of training annually for each inspector
- 03 Don't know
- No response
- 07 In house
- Yes, early on, they were hiring people with no experience, so there had to be a great deal of training effort. Now people have more training and there are more internal promotions, therefore there is less training needed.
- 10 Not applicable
- 11 Not really
- 13 Not applicable
- 14 No
- Because of technology, training changes with it
- 15 Update training with new requirements
- Have to keep up with technology
- 17 Not applicable

- Yes, because of changes in technology, games are changing, and consequently, training must change to keep up with changes in games
- 25 Yes
- 26 No
- No response
- 28 Title 31 applied to tribes
- No response
- 32 Not applicable
- 33 Not applicable
- Not applicable
- 40 Not applicable
- Yes, updated to meet standards of changes in laws
- 48 Not much
- 49 No
- No response
- No response
- 55 More extensive
- Not applicable
- Not applicable
- Not applicable
- Not applicable
- Because of technology, training changes with it
- New laws and situations so must adjust accordingly
- 77 No response
- 78 Increased
- 79 Not applicable
- Yes, the requirements for games have changed
- Not applicable
- Not applicable
- 85 Title 31 in 8/96
- Yes, due to increased knowledge
- Not applicable
- 93 More stringent
- 95 Title 31 expanded
- 99 No response
- 100 Yes, with implementation of Title 31
- Yes, more extensive, more customer service, more human resources, and workers rights training
- Not applicable
- Not applicable
- 106 No
- Yes, games are changing (technology and features) so have to keep up to date; bingo computerized now
- 108 More stringent, especially regarding blackjack
- 109 No
- 110 No response

- 111 Stricter. New MICS have made training more stringent.
- 117 Not required
- 118 No
- No response
- 120 See 17
- 121 No response
- 122 Not a lot
- No response
- 124 No
- 125 No response
- Yes, Federal government requirements have increased because of introduction of MICS
- 129 Not applicable
- Not applicable
- 132 Updated information/technology
- 133 More training, just with growing.
- Not applicable
- 136 Same
- Not applicable

5g. Please elaborate on your training policies.

- 01 No
- O2 Conducting evaluations
- 02 Investigation
- No response
- O6 Security training in house
- 07 Las Vegas casino training
- 10 Not applicable
- 11 Do both on and off premises
- 13 Blackjack training
- 13 In house training
- 13 Trained on-the-job
- 13 Upon hire and sometimes annual
- 14 Not applicable
- 15 Not applicable
- 16 Not applicable
- 17 Orientation on gaming ordinances, NIGC
- 17 Overview of internal controls
- 17 Training done by casino training department and the personnel department
- 17 Undergo upon hire
- Not applicable
- 25 Travel to Vegas for training
- No response
- No response
- When hired, retraining every six months

- 29 In house training for security
- 31 Not applicable
- 32 Cage, security, floor training; job specific training
- 32 Casino provides training
- Has changed over past five years, they have cut down on training
- Training is done when needed
- Not applicable
- 40 Orientation, internal control
- 47 No response
- 48 Off site and in house
- 49 Ongoing
- 51 Regulatory and criminal procedure investigation
- 54 Security
- 54 Surveillance
- Not applicable
- Classes for different gaming and on the job training.
- 56 Technical training
- Training has become more stringent
- Training is ongoing and done by outside and inside trainers
- 57 Some onsite and some offsite training
- 57 State provides compact training
- 57 Technical and machine specific training
- Dealer training, depends on position
- 58 Usually outside trainer hired
- Training is ongoing
- 62 Not applicable
- Not applicable
- 77 At hire
- 77 Orientation
- 77 Security
- 77 Sexual harassment
- 77 Slots and machine training
- 77 Title 31
- 77 Upon promotion
- 78 External, off premises
- Department managers, etc., offsite and onsite training for customer service, computer service training, management skills, technical training on new equipment.
- 79 Not applicable
- 81 Not applicable
- Depends on position. Banking courses taught by Human Resources dept.
- Not applicable
- 82 Orientation-6hours
- 82 Training is ongoing
- Slots technical training, how equipment works and repair and how to spot problems

- Not applicable
- 87 Must know everything about job, regulations, code of ethics
- 87 Training by training coordinator and departments
- 87 Training is done at hire and then as often as can be offered after that
- 93 No response
- 94 Not applicable
- 95 No response?
- 99 Conducted by in-house training dept.
- Not applicable
- Not applicable
- On-the-job training, with each hire, done by supervisor or manager, Title 31 training
- Title 31 training, operational, customer service on the job, security training, EMT, training, ongoing and annual
- Not applicable
- 117 General casino training
- 118 Auditing
- 118 External training
- 118 Machines
- 118 Table games
- 121 No response
- Both in house and off site
- 123 Security training in house
- 124 Periodic and internal
- 125 In house training for some categories of employees
- 125 Send to training academies off premises
- Depends on position. Banking courses taught by Human Resources dept.
- Ongoing, different types for different types of employees
- Not applicable
- Not applicable
- 134 Depends on department
- 134 Training is done in-house, or by outsourcing
- 134 Training is on going
- Not applicable
- 138 Technicians: verbal and hands-on training.

7e. How have your reporting requirements (for gaming receipts) changed over the past five years?

- 01 No
- 02 Not applicable
- 03 No

- 06 Don't think so
- 07 Have not changed
- 09 Don't Know
- Have not
- 11 No
- 13 No
- Now have to report to state because of implementation of compact
- 15 Several years ago, more information was required
- 16 No
- 17 They haven't
- Yes, as new games and machines are added to what is offered
- Yes, NIGC mandated changes
- NIGC imposed requirements in 1995
- 27 No
- No response
- 29 Don't think so
- Will be a change because NIGC has instituted new regulations requiring auditor to be more responsible in making sure casino is compliant (MICS)
- 33 More extensive, because there are more requirements
- 36 No
- 40 No
- 47 They haven't
- 48 No
- 51 No
- 54 Same
- 55 No
- More stringent
- 57 Yes
- NIGC changed from accepting agency wide audit to want casino only
- 59 No
- 62 Added requirements, more detailed
- Have not changed
- 77 No response
- 78 No
- Now have to perform double audit (one from inside and one from outside auditor)
- Yes, changes quarterly, give more money to NIGC
- State requires slightly different format that is more difficult
- 84 Don't know
- Have not changed
- Have not changed
- 93 They haven't
- 95 Don't know
- 99 No response
- 100 No response
- More extensive breakdown on departments
- 104 No

- 105 No
- Have not changed
- Added new games, features, so reporting methods have changed with it
- Not at all
- Have not changed
- Not required to report to NIGC until last year, prior to that just sent audit
- 110 State requirements changed from yearly to weekly
- Have not changed
- 117 Don't know
- 118 They haven't
- 118 They haven't
- 121 Yes, more detail
- 122 No
- 123 Don't think so
- No new requirements
- slightly, suspicious activity reports
- they haven't
- 127 No
- 129 Don't Know
- 130 Different formats, add graphs, etc.
- Decreased slightly, forms have not changed
- 133 No
- Evolved. Foresee a problem, will add a requirement.
- 136 Same
- 138 No

8c. What changes, over the past five years, have you seen in record keeping requirements?

- 01 None
- 02 None
- No big deal
- 06 No response
- No response
- MICS from Feb. 4 forward. Implemented higher standards...but hasn't changed operation too much because their standards were that high before.
- Not applicable
- 11 None
- More requirements
- 14 No
- 15 No
- Have become more efficient by cutting down on paperwork and still maintaining integrity of operation
- 17 Give a separate license to bingo facilities within a casino
- 17 Renewed compact, had to provide more information
- 20 Record keeping has changed to keep up with technology

- 25 Same
- 26 No
- None None
- 28 Increased level of compliance
- 29 No response
- 32 Not applicable
- 33 No
- 36 No
- 40 Separate licenses for bingo facilities
- 40 Renewal of compact
- 47 More conservative and stringent on keeping better records
- 48 None
- More stringent
- 54 State access to slots audits
- 55 None
- Not applicable
- 57 IRS raised minimum cash transaction
- Bureaucratic changes hard to keep up with
- 59 No
- 62 No response
- None None
- 77 None
- No response
- 79 Not applicable
- None None
- 82 No
- 84 None
- 85 Increased-Title 31
- 87 MICS, passed by NIGC, but own controls far exceed it
- 93 Same
- 95 Don't know
- 99 Title 31
- 100 No response
- 103 No
- 104 No
- More stringent but tribe still ahead
- 106 No response
- Just because of technology changes, growth, increased layers of regulation require more detailed record keeping
- More stringent, detailed audits
- 109 None
- Level of detail required by state on slot reporting
- 110 Reporting to NIGC, quarterly fees new this year. Method of reporting doesn't work; Bingo reporting applied to blackjack and slots
- 110 Survey required by Senate
- 110 Title 31

- 111 None
- 117 Printing annually
- 118 Better tracking
- Expansion of areas of reporting requirements
- 118 More extensive as technology allows
- 118 None
- 118 Tribal governments imposing stricter regs than feds
- 121 No
- 122 None
- 123 No response
- 124 No response
- 125 None
- 125 Tribal government increased security requirements involving documents
- More stringent, so there is f accountability. Makes for better business
- 129 No
- 130 No
- MICS, made things more complicated, more info requested, more detailed
- No response
- 134 Computerized slots, central computer connected to all slot machines.
- None
- 138 Different changes to comply with NIGC.

11. Are there other important areas of regulation that we have not asked about?

- 01 No
- O2 Presence of state police
- No, but it is our policy to do so
- 06 No
- 07 No.
- 09 Background checks on vendors who more than \$48,000 worth of business with a tribe in 1 year
- 10 No
- too much burden on the outlet
- 13 No
- 14 No
- 15 No
- 16 Monitor all games on video
- Online machine to get money information from Casino
- 17 No
- Non-gaming regulations that affect gaming
- 25 No
- Number of employees required insuring integrity of games
- 27 MICS
- 27 Taxes
- 27 Vendors
- 28 Ensure honest people

```
28
      Allow assets go back to tribes
29
      No
32
      No
33
      No
36
      No
40
      No
47
      No
51
      Jurisdiction authority issues of tribal police
54
      No
55
      No
56
      No
57
      Background checks, underage gaming
58
      No
59
      No
62
      No
64
      No
77
      No
78
      No
79
      No
81
      No
82
      No
84
      No
85
      No
87
      All other normal business regulations
87
      Building codes
87
      Environmental codes
93
      Multi-tiered regs
93
      NV and NJ less regulated
93
      Uniformity of regs in states
94
      Liquor control onsite
94
      Police
94
      Regulatory burden
95
      No response
99
      No response
100
      No
103
      No
104
      MICS
105
      No
106
      No
107
      Regulate all activities including food and beverage and marketing
108
      No
109
      No
110
      No
111
      No
117
      No
```

118

Compliance Investigations

- 118 Crimes Occurring at operation
- 118 Patron Disputes
- 118 State inspections
- 121 No
- 122 Perception of regulation
- 123 No
- 124 No
- 125 No
- 125 No
- 127 No
- 129 No
- 130 No
- 132 No
- 133 No
- 134 No
- 106
- 136 No
- 138 No

13b. What social service activities are you required to perform? Who requires you to do this?

- 01 No response
- Tribal govt. requires gamblers anonymous, seed money for businesses
- No response
- 06 Not applicable
- 07 required 1% to Gamblers Anonymous
- 09 Not applicable
- 10 Not applicable
- 11 None
- 13 Not applicable
- 14 Not applicable
- 15 Signs with Gamblers Anonymous information
- 16 Not applicable
- 17 Not applicable
- 20 Contributions to responsible gaming organizations
- 25 IGRA requires tribal welfare, scholarships, housing
- 26 Day care
- 26 Elder care
- 26 Housing
- 26 IGRA
- Medical services
- 26 Scholarships
- No response
- No response
- Not applicable
- 32 Not applicable

- 33 Not applicable
- 36 Not applicable
- 40 Not applicable
- 47 Hotlines in restrooms
- 48 None
- Education for employees (tribal and non-tribal)
- 51 Gamblers anonymous
- Percentage of revenue as required by compact
- Not applicable
- 62 Not applicable
- Not applicable
- 77 Not required but is tribal policy
- Not required but is tribal policy
- 79 Not applicable
- 81 Don't know
- 82 Not applicable
- 64 Gambler's Anonymous, ¼ of 1% of gross net goes to program
- Not applicable
- Not applicable
- 93 Not applicable
- 95 Family social service program
- 95 Health service program
- 99 Not applicable
- Not applicable
- Not applicable
- 104 IGRA federal social programs
- Not applicable
- Not applicable
- 107 State compact requires establishment contribute a percentage to gamblers anonymous group
- 108 Not applicable
- Not applicable
- Not applicable
- 111 Not applicable
- 117 Not applicable
- 118 No response
- 118 Not applicable
- 121 No
- None
- 123 Not applicable
- Not requirements but is tribal policy
- 125 Not applicable

- Not required, but is tribal policy
- 127 Not applicable
- 129 Not applicable
- 136 Gambler's Anonymous contributions
- Not applicable

13c,d. Have these requirements changed over the last five years? If yes, explain.

- 01 Not applicable
- 02 Don't know
- No response
- 06 Not applicable
- 07 No
- 09 Not applicable
- 10 Not applicable
- Not applicable
- 14 Not applicable
- 15 No
- 16 Not applicable
- 17 Not applicable
- Yes, there was no state requirement five years ago
- No response
- 26 No
- Not applicable
- No response
- Not applicable
- 32 Not applicable
- 33 Not applicable
- 36 Not applicable
- 40 Not applicable
- 47 Not applicable
- 48 Not applicable
- No response
- No response
- Not applicable
- Not applicable
- Not applicable
- Not applicable
- Not applicableNot applicable
- 64 Not applicable
- No response

- Not required
- 79 Not applicable
- Yes, have been revised
- Not applicable
- Very new, 8/97 effective
- Not applicable
- Not applicable
- 93 Not applicable
- 95 Don't think so
- 99 Not applicable
- Not applicable
- Not applicable
- 104 No
- Not applicable
- Not applicable
- Did not have state requirement prior to 1997 because there was no compact.
- Not applicable
- Not applicable
- 110 Not applicable
- 111 Not applicable
- Not applicable
- Not applicable
- Not applicable
- 121 No
- Not applicable
- Not applicable
- 124 Not applicable
- Not applicable
- Not required
- Not applicable
- Not applicable
- Not applicable
- Not applicable
- 133 Not applicable
- Not applicable
- 136 No
- Not applicable

13e. Are there other social service activities that you support?

- 01 Yes
- 02 Yes
- No response
- 06 Yes
- No response
- 09 Not applicable

- Not applicable
- 11 Yes
- Not applicable
- 14 Not applicable
- 15 No
- 16 Not applicable
- 17 Not applicable
- 20 No
- 25 Yes
- No response
- No response
- No response
- 29 Yes
- 32 Not applicable
- 33 Not applicable
- Not applicable
- 40 Not applicable
- 47 No
- 48 Yes
- No response
- No response
- Not applicable
- Not applicable
- 57 Casino tribal management program
- 57 College funding, job corps
- Not applicable
- Not applicable
- Not applicable
- Not applicable
- 77 No response
- No response
- 79 Not applicable
- 81 No
- Not applicable
- No response
- Not applicable
- Not applicable
- 93 No
- 95 Yes
- 99 No response
- Not applicable
- 107 No

- 108 Not applicable
- 109 Not applicable
- Not applicable 110
- 111 Not applicable
- 117 No
- 118 Not applicable
- 118 Yes
- 121 No
- 122 Yes
- 123 Yes
- 124 Yes
- 125 No response
- 125 Not applicable
- 127 Not applicable
- 129 Not applicable
- Not applicable 130
- Not applicable 132
- 133 Not applicable
- 134 Not applicable
- 136 No
- 138 Not applicable

13f. Please describe these activities. (Yes, required to do so)

- 09 Not applicable
- 10 Not applicable
- Not applicable 13
- 14 Not applicable
- Not applicable 15
- Not applicable 16
- Not applicable 17
- 20 Not applicable
- 25 Health insurance benefits
- 32 Not applicable
- 33 Not applicable
- 36 Not applicable
- 40 Not applicable
- 55 Not applicable
- 56 Not applicable Not applicable 58
- 59 Not applicable
- 62 Not applicable 64 Not applicable
- 79 Not applicable
- 81 Casino – tribal management program
- 81 College funding, job corps

- 81 No
- Not applicable
- Not applicable
- Not applicable
- Not applicable
- 94 Not applicable
- 111 Not applicable
- 127 Not applicable
- 129 Not applicable
- 130 Not applicable
- Not applicable
- 133 Not applicable
- Not applicable
- Not applicable
- Not applicable

13g. Please describe your activities. (No but it is our policy to do so)

- 01 Clothing for community
- 01 Computer training
- 01 Education subsidies
- 01 Health packages
- 01 Meal provisions for community
- 92 \$850 a month to each tribal member
- 02 College scholarships
- 02 Credit union
- 02 Hardship provisions
- Health insurance benefits to tribe
- 02 Medical Assistance
- 02 Tribal social services dept.
- hotline for employees witnessing fraud or theft
- 06 compulsive gambler program
- 06 gamblers anonymous
- 06 gambling hotline
- No response
- O9 State Council on Compulsive Gambling make contributions to
- O9 Tribal Commission bars patrons at their own request

- 10 Not applicable
- provide medical and education support
- 13 Don't Know
- 14 Not applicable
- 15 Not applicable
- 16 State Council on Problem Gambling fund hotline and provide information
- 17 Not applicable
- Not applicable
- No response
- 27 contributions to state compulsive gambling council
- 27 provide numbers for Gambler's Anonymous
- No response
- 29 gambling hotline
- 32 Not applicable
- 33 Training to recognize heavy gamblers
- Social service dept., treatment facility for gambling addiction, assist outside agencies
- 40 Not applicable
- 47 Hotlines in restrooms
- 47 Training for Gamblers Anonymous
- 48 College subsidy
- 48 Medical subsidy
- 51 Dental facility tribal/non-tribal
- 51 Tribal medical facility
- No response
- 55 Brochures for responsible gaming
- 55 Self-exclusion for individuals who feel they have a gambling problem
- Not applicable
- Not applicable
- 58 Gamblers anonymous pamphlets
- 59 Social service dept., treatment facility for gambling addiction, assist outside agencies
- 62 Benefits to tribe
- Provide information for Gamblers Anonymous
- 77 Gamblers anonymous info and #
- Allocate \$2,000 month for compulsive gambling
- Fig. 79 Employee and patron hotlines
- Other policies just have to do with operation, for ex. If someone is on the floor more than 24 hours, they will take that person off the floor.
- tried to give money to different groups, but nobody wanted it, says there are no groups like Gamblers Anonymous in state
- 81 Not applicable
- Not applicable
- 84 Not applicable
- Not applicable
- 87 Referrals and employee assistance place

- Work with gamblers anonymous
- 93 No response
- 95 Charitable donations
- 95 City, indigenous games
- 99 Provide literature on problem gambling
- 100 Employee assistance program
- 100 Gamblers anonymous brochures
- Not applicable
- Hotline, problem gaming, check cashing system, match gambler with services
- Not applicable
- Not applicable
- 108 Donate \$ to the state
- Employee assistance program to target gambling addiction
- 108 Hotline, referral service
- 108 Social service within the tribe
- Not applicable
- 110 '86 program
- 110 AA meetings
- Employee Assistance Program (EAP) for many mental health problems
- 110 Information and fliers posted for gambling problems
- 111 Information posted.
- No response
- 118 Funding for State Compulsive Gambling
- 118 Money and information for Gamblers Anonymous
- 121 No response
- 122 Education and medical underwritten
- 123 Compulsive gambling program
- 123 Gambling hotline
- 124 Casino hotline
- Gambling hotline and donation to Gambler's Anonymous
- Not applicable
- 127 Not applicable
- 129 Don't know
- Not applicable
- 132 Gambler's hotline posted
- Not applicable
- Donate to local gambler's anonymous and to state
- Not applicable
- 138 Will have Gambler's Anonymous.

14a. In your opinion, are there regulations which are necessary to the gaming industry? (Please describe them)

- 01 Machine Integrity T /fed
- 02 Criminal record checks
- 02 Financial

- 02 Fingerprinting
- 02 Tax
- 03 Internal controls
- 06 All current regs
- 07 Licensing and background checks
- 09 Establishment of gaming commission by each tribe tribe
- 09 Quarterly audits tribe
- 10 Yes, money regulations (access to money and money flow) tribe
- 11 Background checks
- 13 Proper accounting system, Federal
- 14 Accounting and auditing
- 15 As a cash control all are needed
- Money handling regulations
- 17 Background checks on vendors and employees to keep the place clean
- 17 Checking equipment, eprongs to insure integrity of the game (tribe).
- Yes, all regulations are important
- 25 Background Checks
- 25 Financial auditing
- 25 Financial reporting
- Accounting/internal controls
- 26 Rules for authorizing games
- 26 Surveillance
- 27 Background checks
- 27 Internal controls
- Ones that insure honest people
- 29 All, for perceptions sake
- 32 Screening of employees tribe and state
- 32 Yearly audits by outside auditors State and NIGC
- 33 Yes
- 36 Criminal background checks
- 36 Fairness of games
- 36 Fiduciary requirements
- 40 Checking equipment, background checks
- 47 Indians can take care of themselves
- 48 Background
- No response
- All regulation, for the sake of the customer
- Onsite inspections state and NIGC
- Yes, protecting integrity of tribe and operation Tribe, State, and Federal
- 57 Background checks state and tribal
- 57 Federal regulations not necessary
- 57 Games regulation
- 57 Yes, fingerprinting
- Background investigations are good, have seen regulations that are helpful, finding criminals, getting national info. FBI hard but able to get them because of IGRA

- 58 IGRA casinos provide economic independence to tribe, created jobs
- 59 Criminal background checks
- Fairness of games
- Others to keep integrity (gaming commission)
- 62 Underage gaming-minors not allowed
- 64 All.
- 77 Regulation essential
- All are important
- 78 Background checks state and tribe
- 78 License renewal or certification
- 78 Machine surveillance tribal and state requirement
- 78 Screening of vendors tribe and state
- 79 All are necessary
- Yes, all are there to maintain integrity of tribe/casino
- 82 Background NIGC oversight and gaming commission
- 82 External audits NIGC
- Industry so new, not over regulated, can't answer
- All except Title 31, especially internal controls
- 85 Important to keep industry clean
- State Police and tribal oversight and NIGC
- 87 Background checks
- 87 Daily auditing, reporting of funds
- 87 Integrity
- 87 MICS
- 93 Handling of Finances
- 95 Financial dealings
- 95 Integrity of game
- 95 Surveillance
- 99 MICS
- 100 Its important to hold to compact in order to protect the integrity or property and the guests
- 100 Overall functions of casino
- Regulation on equipment
- Rules of games
- 104 Yes, MICS and Background checks
- Yes, internal controls, compliance, tracking money, checks and balances, auditing
- 106 MICS, through NIGC
- 106 Regulations on the facility itself, gaming commission
- 106 State compact
- Each regulation plays important role
- To maintain honesty and integrity of tribe, game and protect public
- 108 Tribes should be responsible
- Everything that we do, security and personnel (state).
- 110 Age restrictions
- 110 Criminal background checks imperative.
- 110 Limits on slots and blackjack

- MICS-great regulation, standardizes and provides credibility, helps auditors know what to do.
- 110 Regulations in reference to payout percentages on slot machines. Random testing Also, helps with credibility of facility
- NIGC does a good job of keeping organized crime from getting in.
- 117 Background Checks T
- 117 Licensing T
- 117 Machine Integrity T
- 118 Internal controls
- 118 No
- 121 Yes, checks on employees
- 122 Background
- 123 Regulations in place
- 124 Nevada Gaming Controls
- Financial, to be regulated by tribal ordinance
- No comment
- 125 Technical requirements for devices, to be regulated by compact
- 127 Yes, NIGC regulations
- 129 Fiduciary requirements
- 129 Licensing and background
- All regulations are important must keep games honest
- NIGC MICS important to keep control of money
- 130 State checks, make sure they are fair
- 132 Background investigations imperative
- 132 MICS very important
- Overall, all are necessary
- Regulations and procedures must be in place for the amount of money flowing, to protect patrons
- All regulations (tribal level of government because they're closest to it).
- Gaming is a privileged industry, must keep out organized grime
- 136 Yes, background checks
- 138 Background checks (NIGC and tribe).

14b. Thinking about these regulations you judge to be necessary for the industry, can you estimate the costs your establishment incurs in complying?

- 01 \$600,000/staff
- 02 1.8 million
- 03 \$500,000
- 06 \$400,000 commission/400,000-600,000 surveillance
- Over one million dollars, largest percentage of time
- 09 1997: \$1.2 mil budget for Gaming Commission
- 09 1998: \$1.4 mil
- On top of fees for state dept. of gaming and NIGC
- Have to hire extra compliance officers for money regulations
- 11 Gaming department

- 13 Accounting system \$30,000
- Spend \$8 million on taxes and fees
- 15 \$100,000 on licensing of employees
- \$1 million on surveillance, with 10-15 security employees and 10 surveillance employees
- 17 \$1 million for compliance division
- 17 \$1 million for gaming commission
- 17 Total of at least \$3 million
- 20 Don't know
- \$2, 400,000 (staff, inspectors, office space, audit, surveillance)
- 26 \$8 million
- 27 6 employees for background check, 13 for inspectors
- No response
- 29 \$800,000-1,000,000
- 32 Licensing \$180,000/yr in screening costs
- 32 Outside yearly audits \$30,000/yr
- 33 Not applicable
- Accounting and auditing cost in excess of \$1million
- 36 Don't know how to measure
- \$1 million on gaming commission, \$1 million on compliance division, Total of \$3 million+
- 47 No response
- 48 Cost of gaming department
- Over one million per year
- Background checks and machine surveillance are a large part of expenses, but cannot calculate.
- 56 No
- 57 Entire division, 5 investigators, 4 staff, \$1 mil plus
- \$100-500 per background check
- Accounting and auditing cost in excess of \$1million
- 62 \$1/2 million
- No response
- 78 \$250,000 to state + costs
- \$50,000 + costs for federal regulation
- 78 2 million to tribal gaming commission and surveillance
- 78 3 million for regs alone
- 78 No response
- 79 No
- 81 Not applicable
- Gaming commission and surveillance department cost \$300,000/yr
- Not applicable
- \$400,000 for background checks
- 85 1/2 million for gaming commission payroll
- 85 Total of at least \$1 million
- 87 Cost of gaming commission is \$1.3 million
- 93 No

- 95 Hundreds of thousands
- 99 Approximately 3 million
- Not applicable
- Equipment and games compliance, costly, use outside firms, agencies
- Background checks: \$225/275 per applicant @ 200 employees (figure includes man-hours of doing checks and cost of checks themselves)
- 105 Costs significant amount
- 106 No
- No response
- 108 In excess of \$1 million
- 109 Don't know
- 110 Criminal background checks: \$40,000-\$50,000/year
- 110 Drug tests: \$12,000/year
- 110 External auditors: \$12,000/year
- 111 Not applicable
- 117 No response
- 118 Millions of dollars
- No response
- 121 \$200,000
- 122 Staff of gaming department
- 123 \$800,000+
- 124 Security, personnel and manpower
- 125 1 compliance auditor, 12 inspectors
- 125 No
- 127 No
- 129 No
- 130 830 employees, 378 compacted employees
- 130 Background \$300 per person
- 130 Background: Drugs \$150 per person
- 132 Tremendous cost
- Gaming commission has a \$1 million budget.
- \$300,000-\$400,000. (Staff of seven internal auditors plus external)
- 136 Don't know
- 138 \$150.00/background check (32 employees).

15a. In your opinion, are there regulations of the gaming industry which are unnecessary?

- O1 Federal background checks/duplication of effort
- Maintenance of state troopers who are performing same function as tribal investigators
- 03 Replace regulators with internal controls
- 06 Don't know
- Over regulated relative to industry
- O9 Tribes resent state taking greater role than compact allows
- 10 Yes, licensing timeframe takes to process is too long. Wouldn't be able to hire

- some people because a lot of Indians do not have good backgrounds.
- Differentiate between class 2 and class 3
- 14 Yes
- 14 Yes
- 15 No
- 16 No
- 17 No, everything is justified.
- Yes, regulations that make no sense
- 25 Federal oversight. Have either state or fed, not both
- 26 No
- 27 Vendors
- 28 Title 31
- 29 Can't think of any
- 32 No
- 33 Yes, Tribal regulations
- 40 No
- 47 Big Brother
- 48 Cost maintaining NIGC
- 48 Fee structure standardized
- 48 Misclassifying class 2 and class 3
- No but more responsibility should be given to tribes
- 54 No
- Reproduction of paperwork
- 56 No
- 57 Federal regulations
- 57 lower level cash transactions
- 57 tracking of winnings
- 58 Ex: audits get excessive
- Tribes trying to become self-regulatory, their own regulations are more stringent.
- 59 Additional congressional oversight at least conditioned upon prior determination
- of no self-regulation
- 62 No
- 64 No.
- Just one government entity, state OR federal
- Redundancy between tribe and state
- 79 No
- 81 No
- 82 No
- 82 No
- Not now
- Title 31, Bank Security Law. The wording is subjective: a record keeping violation is punished by five years in prison. (IRS and Dept. of Treasury)
- Fees to all levels of government, what they make they want to keep on Tribe
- 93 No
- 95 No
- 99 Not really

- 100 Yes
- 103 No
- 104 No
- Adjust regulations to the size of the establishment, tiers too wide
- Redundancy is unnecessary
- 106 None
- 107 State of NM, by compact, has regulations that make no sense. For example: casino not allowed to give free food or accommodations, places casino at disadvantage
- 108 Some safeguards on nonsensitive gaming equipment
- 109 No
- MICS are limiting. For example, slot machines limited to \$5, blackjack limited to \$200. Why? Customers want higher amounts.
- 110 Two fisted effort in compact, overkill. For example, must keep surveillance videotapes for 30 days. Record retention laws. Excess supervision required in pits.
- 111 Yes, but can't think of any
- 117 Issue of class interpretation
- 118 No
- 118 Sliding scale
- 120
- 121 No
- Make fee structure same
- 123 Don't know
- 124 No
- 125 No
- 125 Yes, all of tribal gaming
- 127 No
- 129 Additional congressional oversight at least conditioned upon prior determination of no self-regulation
- 129 No.
- None specifically, some are extra difficult
- 133 No
- Gaming related contractors issue. State and NIGC require that vendors to casino be licensed by the state. Don't object in general but small firms cannot afford licensing process. Limit it by money, contractor who does over \$10,000 must be licensed.
- 136 No
- No, can't over-regulate gaming.

15b. Now thinking about these regulations that you consider unnecessary, can you estimate the costs you establishment incurs in complying?

- 01 Big enough to notice
- 02 \$400,000+
- More of an issues due to "headache" than monetary cost

- 06 No response
- No response
- 09 Not applicable
- 10 No
- 11 No response
- 13 No
- 14 No response
- Not applicable
- 16 Not applicable
- 17 Not applicable
- Some of those regulations put casino at disadvantage to other establishments and they loose money
- No response
- No response
- Two employees
- 28 \$150,000
- No response
- 32 Not applicable
- 33 No
- 36 No
- 40 Not applicable
- 47 No response
- 48 No
- No response
- No response
- 55 Could be cut by ¼ if computerized.
- Not applicable
- Not applicable
- Very expensive
- 59 No
- Not applicable
- Not applicable
- 77 Don't know
- 78 Okay as long as it is affordable
- 79 Not applicable
- 80 Every cashier, ¾ of a body. Approx. \$13,000
- 81 Not applicable
- Not applicable
- Not applicable
- 85 \$70,000
- \$1.3 million for gaming commission budge
- 93 No response
- 95 No response
- 99 No response
- Not applicable
- Not applicable

- Not applicable
- 105 No
- Not applicable
- Disadvantage compared to other non-Indian establishments
- 108 Don't know
- Not applicable
- 110 Salaries for pit supervision: \$50,000-\$60,000
- 110 Video equipment: \$10,000-\$15,000
- 111 Not applicable
- 117 State
- 118 No response
- Not applicable
- 121 No response
- No response
- No response
- 124 No response
- 125 No
- 125 Not applicable
- 134 Don't know
- Not applicable
- Not applicable

16. Are there any regulations of the gaming industry that you would like to see added?

- 01 No
- Yes require background checks for everyone
- 03 Keno and Bingo
- 06 No
- 07 No
- 09 No
- 10 No
- 11 No
- 13 No
- 14 No
- 15 No
- 16 Trust tribes a bit more
- Background on vendors and non-gaming vendors, especially getting information on international companies. No access to interpol or NCIC (National center for Information on Crime).
- 20 No

- 25 No
- 26 No
- 27 No
- 28 Creation of autonomous commissions
- 28 Gaming commission needs 24 hour on site gaming inspectors
- 29 No
- 32 No
- 33 No
- Would like to see it required that NIGC increased its staff for adequate turn around time.
- 40 Backgrounds on vendors
- 47 Native American Desk at White House
- 48 No
- Authority and responsibility of gaming bestowed to tribal commission itself
- Yes, MICS are good
- Yes, more opening of different types of games to open up business more, this would require more regulations
- 56 No
- More criminal penalties, level of specificity
- 58 No
- Would like to see it required that NIGC increased its staff for adequate turn around time.
- With spread of gaming, research in NV, Colorado, etc. Each jurisdiction takes it and makes their own
- 64 No
- No but MICS are too vague
- 78 Stricter minimum internal control standards
- 79 No
- 81 No.
- More frequent visits to check businesses, as a whole, more presence
- 84 No
- NIGC more teeth, it is the best level/agency to give power to.
- 87 No.
- 93 Yes, regulate Bingo
- 93 Yes, regulate Card Rooms
- 93 Yes, regulate Class II
- 95 No
- 99 No
- 100 No
- 103 No
- 104 No
- 105 No
- 106 No
- No, Indian gaming is one of the most regulated industries
- Not at this time, reviewing MICS
- 109 No

- 110 No. From the property's perspective, we will do everything we need to do in order to maintain the integrity. We are trying to make money and do not need the government to step in and tell us what makes sense. 111 No
- 117 No
- 118 No
- 118 Yes, would like to see all non-Indian casinos adhere to same laws and regulations that Indian casinos do
- 121 No
- 122 No
- 123 No
- 124 No
- 125 Better licensing
- 125 No
- 125 Refine employee definitions, e.g. "key" and "gaming"1
- 127
- 129 No
- 130 No
- 132 No
- 133 No
- 134 No
- 136 No
- 138 People who can't speak English.

17. Are there any areas of the gaming industry where you think regulatory enforcement is excessive? (Please elaborate)

- 01 No
- 02 No
- 03 Yes, not regulation itself but method of enforcement
- No problems 06
- 07 No
- 09 Attempt by state to take greater role than necessary
- The tribe is a state like any other state, they never gave that up. 10
- Yes, should be able to regulate themselves because they are a sovereign nation. 10
- 11 Compact issues
- 13 Categories are too broad, there are no defined punishments for MICS
- 14 No
- 15 No
- 16 State and tribes go overboard on background checks, for example stringent background checks of non-gaming employees at the establishment
- 17 No
- 20 Yes
- 25 State certification licenses for employees
- 25 Vendor licensing
- 26 No

- 27 No
- No if appeals procedures are in place
- 29 No
- 32 No
- 33 No
- 36 No
- 40 No
- 47 Not really
- 48 Compact requirements
- 49 Yes, suspicious activity requirement
- 51 Leave regulation to tribe
- 54 No
- Yes. Food and beverage are regulated like they are part of gaming. They have nothing to do with the outcome of the machines. There is no need for them to be regulated like they are part of gaming.
- 56 No
- 56 No
- No, just requiring busy work
- 58 No
- 59 No
- 62 No
- No comment
- 77 No
- Not many
- 79 No
- 79 No
- 81 No
- 82 No
- 84 No.
- 85 Title 31, IRS
- 87 No
- 93 No
- 95 No.
- 99 No
- 100 Yes, in general
- 104 No
- 105 IRS, excessive burden, casino doing job or IRS
- 106 No
- 107 Yes, Indian country
- State's oversight, implicating tribe's work
- 109 Tribal gaming-more strict than needed
- In WI, issues within the gaming compact. Interpretation is ridiculous. Lack of knowledge combined with power is frustrating.
- Definitions of games, disallowance of craps, etc. Gambling is gambling.
- Holding of land for a certain time before can build a casino on it.
- 111 Player pool backed instead of casino backed.

117 No 118 Issues attached to gaming but not really gaming 118 No 121 No 122 Requirement for compact 123 No problems Classification of games not done well 124 125 129 No 130 No 132 No 133 No 134 IRS on money laundering, Title 31. Must track customers over \$10,000 in winnings and send all information to the feds. One person (\$35,000) devoted to this, plus computer, desk, etc. 136 No 138 No 18. Are there areas of regulation where you think enforcement is too lax? Please explain. 01 No 02 No 03 Background checks 06 No 07 No 09 No 10 No 11 No 13 No 14 No 15 No 16 No 17 No 20 In non-Indian gaming industry 25 No 26 No 27 Vendors 28 Internal control 29 No 32 No 33 No 36 In other states, compact negotiations are discriminatory 40 No

Yes, Cross deputize tribal peace officers. Public safety enforcement power needs

47

to be given to tribes.

- 48 No
- 49 No
- No, this is case by case
- NIGC needs more presence and staff
- 55 No
- 56 No
- Yes, do enforce criminal history background only get statewide check from state Bureau of Investigation. Must wait for national check
- 58 No
- In other states, compact negotiations are discriminatory
- Not in this operation, but possibly
- 64 No
- 77 No
- 78 No
- 79 No
- 81 No
- Presence, need increase presence of regulators
- 84 No
- 85 NIGC
- 87 No
- 93 Yes, Class II gaming
- 95 No
- 99 No
- 100 No
- 103 No
- 104 No
- 105 No
- 106 No
- 107 In state, non-Indian gaming
- 108 In general, need priorities
- 109 No
- For two to three years, WI has hounds slots, not looked at tables. But slots have security features within the machines, biggest level of concern is the live games. Now is the first time in four years WI has looked at live games.
- 111 Employment regulations.
- 117 Yes, Gaming in Nevada
- 117 Yes, Industry gaming
- 118 No
- 118 Non-Indian gaming
- 121 No
- 122 No
- 123 No
- 124 No
- 125 Financial, MICS
- 127 No
- 129 No

- 130 No
- 132 No
- 133 No
- 134 No
- 136 No.
- 138 Check employees out, if can't speak English then shouldn't work.

19. Have you noticed any changes in the laws or regulatory practices affecting the gaming industry? (Thinking back over the last several years)

- 01 More national regulations
- O2 Yes, more stringent
- 93 Yes, cost and title 31
- 06 Federal MICS
- 07 Yes, more strict
- 10 Legislatures are getting sneaky
- 11 MICS
- 13 No
- 14 Application of state laws because now have a compact
- 15 No.
- Deleting and adding as technology goes
- 17 Groups working against Indian gaming
- 20 No
- 25 Stricter cash reporting
- Yes, greater involvement of feds in Indian gaming
- 27 Seminole decision
- 28 Lots of lawsuits
- 28 Scope of gaming
- 28 Style of gaming
- 29 MICS
- Attempt, federally, because of Nevada's dislike of Indian gaming, to convince senators that Indian gaming is not regulated, and Nevada gaming is over regulated when this is simply not true.
- Respondent thinks this has happened because state needed to figure out a way to spend tribes' money
- State has had to adjust as they have learned more and as Indian gaming has gotten larger, they have had to increase size to regulate
- 32 There has also been a broadened scope of vendors
- 33 More litigation, because of proposition 5
- 36 In other states, compact negotiations are discriminatory
- There are more and more groups that are working against Indian gaming
- 47 No
- 48 MICS
- 49 None
- Regulations have extended to more types of gaming
- Tribal gaming disproportionately regulated

- More regulated and enforced
- Yes. Attempt to have federal and state injunctive authority so state law changes to affect gaming would affect the compact, etc.
- Prop. 5, more stringent regulations, enacted to protect gaming and to let people know that tribe is honest
- 57 No
- Develop new laws for growth
- Yes, NIGC issues bulletins, expand IGRA
- In other states, compact negotiations are discriminatory
- Title 31. NV maintains own control
- 64 Same
- 77 No
- 78 No
- Yes, location of casino. Before, if the casino was not near a bingo hall, then the tribe couldn't own it. Now Tribe can own separate Casino facility.
- 81 No
- 82 No
- 84 No
- NIGC playing a more active role (MICS), but illegal activities still possible, should do visits
- Indian gaming pressure from congress made rules more stringent, maybe because others were not regulated enough
- 93 More national regulations, due to the proliferation of tribal gaming
- 95 Adoption of MICS
- 99 More strict, NIGC more involved, which is good
- 100 Certain types of games not legal in state
- Limitations on table games and hours of operation
- 100 No simulcasting at certain tracks
- 103 No
- Federal government wants to impose new regulatory statutes or rescind existing ones that tribes have already adapted to.
- 105 Affecting indian gaming....enemies of indian gaming
- Generation of fees for NIGC, for establishment of a regulatory body and staff, presence, etc. Bigger presence with explosion of Indian gaming and the perception of un-regulation.
- 106 Provide checks and balances
- 107 No
- 108 Gaming commission regulations expanded
- State developed laws regarding the prosecution of gaming crimes
- 109 No
- Before compacted, more games. Upon compact, limited games.
- 110 IRS banking secrecy act 8/96. Suspicious transaction reporting this year.
- NIGC has become more involved. Prior, tribes were left alone to manage selves.
- 111 Trying to tighten up.
- 117 Better understanding of law
- 118 More technical

- There have been more laws geared towards Indian gaming rather than gaming in general
- 121 No response
- 122 MICS
- 123 Federal MICS
- New rules for new products
- 125 No
- 127 No
- 129 No
- 130 No
- NIGC getting much more involved, more field reps, more spot checks, more into financial statements
- Gaming is new. Problems in some places, other ok.
- MICS. Regulations 6 in Nevada-trying to emulate the idea, state tries to pass them. Casino voluntarily adopted NIGC's-want to be as squeaky clean as possible.
- 136 No
- 138 Cracking down on background checks.

20. In your opinion, do the regulatory activities of the state exceed those provided for in the compact? Could you please give me some examples?

- 01 Not applicable
- 02 Yes
- No, we have a waiver revision to petition for if too strict
- 06 No comment
- 07 Not applicable
- No, the state can't keep up with all of the regulations, they are too far behind.
- 11 Not applicable
- 13 No
- 14 No
- 15 No
- 16 No.
- 17 No
- 20 No
- Not applicable
- 26 No
- 27 Differing interpretations on what compact means. Define technical standards for gaming device
- Not applicable
- 29 Privileged info
- For example, vendors are regulated more than they should be
- Yes, attempt to take greater role in machine compliance. Say they want to be there to see installation or testing on EPROM (computer chip) Compact says only state should receive paperwork, they do not have to test and approve themselves.
- Yes, the compact was poorly written

33 Not applicable 36 No 40 No 47 No response Not applicable 48 Not applicable 49 51 No 54 No Yes. At times, depending on interpretation of the compact, state thinks poker is a 55 class III game, ignoring Federal law which says it is Class II. Therefore they are ignoring compact which states that state has no authority over Class II activities. 56 Yes, tribe can regulate itself 57 No 58 No 59 No 62 No 64 No 77 Not at this time 78 No 79 Not applicable 81 No 82 No 84 No 85 Started off that way, but no longer 87 No 93 No 95 No 99 No 100 No 103 Not applicable 104 No 105 No 106 No 107 No Too extreme! Doubling of work. Tribe needs to be primary regulators; state 108 needs to be a true oversight agency. 109 No 110 We won't let them, they try. 111 No response No comment 117 118 No 118 Not applicable 121 No response 122 Not applicable 123 No comment

124

No

- 125 No
- 127 Not applicable
- 129 No
- 130 Don't know
- Not applicable
- Not applicable
- At times. Currently, dispute over whether contracted CPA firm now has to be licensed.
- 136 No
- Not applicable

21. Again, in your opinion, are there enforcement activities carried out which exceed the provisions of the compact? Could you please provide examples?

- 01 Not applicable
- 02 Background investigations and fingerprinting
- 03 Title 31
- 06 No
- 07 Not applicable
- Yes, attempt to take greater role in machine compliance. Say they want to be there to see installation or testing on EPROM (computer chip). Compact says only state should receive paperwork, they do not have to test and approve themselves.
- 10 No
- 11 Not applicable
- 13 No
- 14 No
- 15 No
- 16 No
- 17 No
- 25 No
- 26 No
- Yes certification of machines
- Not applicable
- 29 No
- 32 No
- 33 Not applicable
- 36 No
- 40 No
- 47 No response
- 48 Not applicable
- 49 Not applicable
- 51 No
- 54 No
- Yes. At times, depending on interpretation of the compact, state thinks poker is a class III game, ignoring Federal law which says it is Class II. Therefore they are

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ignoring compact which states that state has no authority over Class II activities.
56
       Yes, tribe can regulate itself
57
      No
58
      No
59
      No
62
      No
64
      No
77
      No
78
      No
79
      Not applicable
81
      No
82
      No
84
      No
85
      No
87
      No
93
      State focuses on small issues threatening establishments that they must comply or
      be shut down
95
      No
99
      No
100
      No
103
      Not applicable
104
      No
105
      No
106
      No
107
      No
108
      Sometimes over zealous enforcing something they don't have a clear picture of,
      inexperience.
109
      No
110
      We won't let them, they try. Many battles with the state.
111
      No response
      No comment
117
118
      No
118
      Not applicable
121
      No response
122
      Not applicable
123
      No
124
      No
125
       Yes, misclassifying Class 2 and Class 3
127
      Not applicable
129
      No
      Don't know
130
132
      Not applicable
133
      Not applicable
134
      No
136
      No
138
      Not applicable
```



22. Finally, over the past five years, what changes have you seen in the gaming industry's practices?

- More regulations (tribal) because so many outlets now
- 02 No response
- More awareness of gambling addiction
- 06 Increase in customers
- 07 Better training and education
- Manufacturers catered to Las Vegas style games. Once the player started playing Different games in Indian Country, suddenly they embraced new products and Started putting them on the floor in Las Vegas Change in style of game.
- Have improved in all areas
- 10 Have learned more
- Tribes have risen to a competitive level and better
- Tribes help other tribes to get started
- 11 No response
- 14 Auditing processes getting better
- 14 Better at communicating experiences with other tribes/casinos
- 14 Indian gaming has become more conscious of security issues
- 15 Level of concern about problem gambling
- 16 Technology moving very fast
- NIGC developed prototype for internal control manual.
- Progressive machine companies taking percentage of revenue. NY and NV writing legislation against?
- No response
- Awareness of problem gambling and appropriate responses to it
- 26 Greater acknowledgement of the effectiveness of regulatory controls
- None None
- 28 Changed accounting procedures and payout
- 29 More customers
- 32 Casinos are getting bigger and larger
- Gone from what people perceived as petty to a multi-million dollar industry
- 32 Industry continues to evolve in terms of new product mix. Traditionally
- 32 They are expanding to include hotels and convention centers like in Las Vegas
- 33 Become more professional, better service to professional
- Varied video machines, more like a game than gambling device, more like entertainment
- 40 Machine companies receiving a share of revenue
- 47 More demand for supervision of expenditures by tribes
- 48 No response
- 49 More competitive
- Rapid overall expansion with lack of qualified personnel
- 54 Consistency improved
- This occurred because Industry feels it should influence the atmosphere of gaming so as to hamper Indian gaming from succeeding.
- Yes, more political and influencing citizens of status, funding candidates.
- More self regulation for tribes

- 56 No
- More diligence for underage gaming
- 57 Training sophistication
- More advertising
- More professional
- Regulations being taken more seriously
- Technology, people want video games and machines with many games
- Anti-gaming demonstrations increasing
- Awareness of the issue is widespread
- Gaming more widely accepted. If regulated and controlled properly, people recognize the benefits
- More aware of addictive gaming. Company's are addressing, educational things
- Were designing towards family, now pulling back
- 64 None
- 77 Gaming on internet
- 77 Laws are being outpaced by technology
- 77 New technology
- 77 Where does electronic gaming fit
- 78 Home computer gaming
- 78 Increase in amount of equipment
- 78 More modern equipment
- New gaming experiences
- 78 Technology
- New bingo halls, casinos popping up everywhere with not enough overflow. Not enough room for growth in respondent's particular area.
- 79 Prop 5 made for marked increase in video gaming
- 81 No
- 82 Market saturation, competitiveness
- 84 No.
- No response
- 87 More operations becoming highly competitive
- Become more exposed to the whole business community and their practices
- Expansion of industry, More money on regs
- 99 Established self-controls
- 99 Learned from experience
- 99 Much more control
- 100 Licensing takes longer
- 100 Non-Indian mini casinos initiative
- 100 Short staffed
- State passed law to expand number of tables in card rooms
- More stringent people being held accountable
- 105 Market saturation, competitiveness
- 105 Shift in family entertainment, them parks
- 105 Tension between Indian and non-Indian gaming
- 106 Grown, added hotels, etc.
- Novelty wore off and casino's fighting for market share

- 107 Technology, new things
- 107 They've had to become competitive by doing things other than state gaminghotels, entertainment
- Money is divided between Indian and Non-Indian gaming industry. Suppliers want to provide to Indian tribes but limited by state to compacted tribes
- Not a cooperative relationship, fight over money.
- Politics! State compacts negotiated in governor's office. When IGRA provided for a state to be involved in compacts, they gave the states a blank check
- Allowing more casino card rooms to open, doesn't seem to be a limit on that but it should be regulated because it saturates the market.
- 110 Changes in slot machines, money handling, now coin free
- 110 Coinless systems coming out. New tokenized system, multi-coin games, etc.
- 110 Count processes and auditing are much more effective.
- 110 Much more aggressive marketing
- Player loyalty, tracking play to reward, repeat business marketing.
- Technologies have grown. Much more to offer customer. More denominations, better mixes of games.
- 111 Changes in games. Slot machines are video machines that pay out a ticket.
- Higher compliance
- Run much better
- 117 Understand laws
- 118 Expansion of technology
- 118 More tribes in industry
- Regulations focussed on Indian gaming, not all gaming
- 118 Some forms hard to regulate, internet
- 121 No response
- No response
- 123 Increase in clients
- 124 Better quality machines
- 124 Computerized
- 124 Introduction of new products
- 124 Modernized
- 125 Better training
- More involvement in creating standard practices
- 129 New games, industry is growing
- 129 Popularity and acceptance
- 130 Industry is growing adding amenities to make customer more satisfied
- More attractions to get people in
- Leading more into electronic gaming, getting away from what bingo is all about
- People growing more aware and where casinos are have impacted the area.

 Towns are active and full all the time, employment rate went up, stores, economy doing better. Welfare also; people who never worked are working. People are going back to school because GED is required for casino employment.
- Gaming is most regulated business ever, justifiably.
- 134 Trend towards more concern and support for compulsive gamblers. Recognized responsibility to "addictions."

- 136 No
- Have more freedom to choose what kind of machines wanted. (110 machines, 5 different types of machines).